

1
2 ALAN W. WESTBROOK, ESQ.
3 Nevada Bar No. 06167
4 PERRY & WESTBROOK, P.C.
5 1701 West Charleston Blvd., Suite 200
6 Las Vegas, Nevada 89102
7 Telephone: (702) 870-2400
8 Facsimile: (702) 870-8220
9 E-Mail: awestbrook@perrywestbrook.com
10 Attorneys for Defendant
11 TARGET CORPORATION
12

13
14
15 UNITED STATES DISTRICT COURT

16 DISTRICT OF NEVADA

17 LEAH MARKS,

18 Plaintiff,

19 v.

20 TARGET CORPORATION a Minnesota
21 Corporation; DOES 1 through 100; and ROE
22 ENTITIES A through Z, inclusive,

23 Defendants.
24

25 CASE NO.: 2:18-cv-00741-KJD-GWF

26
27 **STIPULATION AND ORDER TO EXTEND TIME TO**
28 **AMEND PLEADINGS TO ADD PARTIES**

29 COMES NOW, Plaintiff, LEAH MARKS, by and through her attorney of record,
30 JOSHUA Y. ANG, ESQ., of the PAUL PADDA LAW, PLLC., and Target Corporation, by and
31 through its attorney of record, ALAN W. WESTBROOK, ESQ. of PERRY & WESTBROOK
32 and hereby stipulate and agree as follows:

33 WHEREAS Plaintiff filed a Complaint alleging negligence against Defendant, Target
34 Corporation for failing to maintain its premises and allowing a defect or dangerous condition to

1 exist on its premises;

2 WHEREAS the Complaint did not specify an exact location of the alleged incident;

3
4 WHEREAS in Answers to Interrogatories Plaintiff more specifically described the
5 incident as occurring in the parking lot, and more specifically that her foot was caught “in the
6 space between the curb and the wheel stop;”

7 WHEREAS, in response to the Plaintiff’s Answer to Interrogatories setting forth the
8 location of the incident, Target Corporation has provided documentation in the form of a
9 Construction Operation and Reciprocal Easement Agreement which sets forth that the
10 maintenance responsibility for the common areas, including the parking lot, remains the duty of
11 the “Developer”;

12
13 IT IS HEREBY STIPULATED that the date to add parties, currently scheduled for July
14 24, 2018, be extended sixty (60) days, to September 22, 2018, to allow time for the parties to

15 ////

16 ////

17 ////

18 ////

19 ////

20 ////

21 ////

22 ////

23 ////

24 ////

1 Amend the Complaint, and/or Answer, to assert claims against the Developer, if necessary.

2 DATED this _____ day of July, 2018.

3
4 PERRY & WESTBROOK
A Professional Corporation

5
6 */s/ Alan W. Westbrook*

7
8 ALAN W. WESTBROOK, ESQ.
Nevada Bar No. 6167
1701 W. Charleston, Suite 200
Las Vegas, Nevada 89102
Telephone: (702) 870-2400
Facsimile: (702) 870-2880
E-mail: awestbrook@perrywestbrook.com
9 Attorneys for Defendant
10 TARGET CORPORATION
11
12

13 PAUL PADDA LAW, PLLC.

14 */s/ Joshua Y. Ang*

15
16 PAUL S. PADDA, ESQ.
Nevada Bar No. 10417
17 JOSHUA Y. ANG, ESQ.
Nevada Bar No. 14026
18 4560 S. Decatur Blvd, Suite 300
Las Vegas, NV 89103
19 Attorneys for Plaintiff
20 LEAH MARKS

21 IT IS SO ORDERED this 25th day of July, 2018.

22
23 

24 UNITED STATES MAGISTRATE JUDGE